

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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UNITED STATES OF AMERICA,

Plaintiff,

Case No. 3:23-cv-00355

v.

TOWN OF LAC DU FLAMBEAU,

Defendant.

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**DEFENDANT’S UNOPPOSED NON-DISPOSITIVE MOTION FOR  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

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Defendant, Town of Lac du Flambeau (“Defendant”), hereby moves to extend the time period to respond to the Complaint. In support of this motion, Defendant states the following:

1. Plaintiff filed this action on May 31, 2023. (Dkt. 1.)
2. Plaintiff asked Defendant to waive service on June 1, 2023.
3. Defendant waived service on June 29, 2023. (Dkt. 4.)
4. Defendant’s response to the Complaint is due July 31, 2023.
5. Defendant has requested an extension of thirty (30) days in which to respond to the Complaint, making Defendant’s response to the Complaint due on or before August 30, 2023.
6. Counsel for the Defendant and Plaintiff’s counsel have discussed the proposed extension and the Plaintiff does not oppose the request.
7. The requested extension will not interfere with any case deadlines.
8. This motion is not made solely for the purpose of delay.

WHEREFORE, Defendant respectfully requests that the Court grant the unopposed motion to extend the deadline for the Defendant to file an answer to the Complaint to August 30, 2023.

Dated: July 24, 2023

VON BRIESEN & ROPER, S.C.

s/ Frank Kowalkowski

Frank W. Kowalkowski

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